



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270 – 2102

October 21, 2019

Mr. Jason Meyers, Administrator  
Air Planning and Assessment Division  
Louisiana Department of Environmental Quality  
Post Office Box 4314  
Baton Rouge, Louisiana 70821-4314

Dear Mr. Meyers:

Thank you for your correspondence submitting the Louisiana Department of Environmental Quality's 2019 Annual Monitoring Network Plan (2019 Plan) for ambient air. The U.S. Environmental Protection Agency has completed its review of the 2019 Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices.

We appreciate your cooperation and work to submit your 2019 Plan, dated June 14, 2019. We applaud the efforts of the LDEQ to manage and maintain the ambient air monitoring network in Louisiana.

The network review process presents an opportunity for the EPA and the LDEQ to collaborate on air monitoring network design. *See* 40 CFR Part 58 Appendix. D, Section 1.1.2. The EPA has conducted its review of the 2019 Plan and proposed network modifications to ensure the air quality surveillance system continues to meet applicable requirements.

I am pleased to inform you that your 2019 Plan is approved with comments, in accordance with 40 CFR §58.10. Details of our review are enclosed. We intend to set up a telephone conference to discuss our comments with you. Additionally, we acknowledge receipt of the SO<sub>2</sub> annual report required under §51.1205(b), which was received August 9, 2019.

We look forward to continued partnership with the LDEQ on our common goals to establish and maintain a successful ambient air monitoring network for the state of Louisiana. If you have any questions, please contact me at (214) 665-6435, or your staff may contact Ms. Frances Verhalen, Air Monitoring and Grants Section Chief, at (214) 665-2172.

Sincerely,

10/21/2019

**X** Jeff Robinson

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Jeff Robinson

Signed by: JEFFERY ROBINSON

Branch Chief

Air Permits, Monitoring & Grants Branch

Enclosure

Louisiana Department of Environmental Quality  
2019 Annual Monitoring Network Plan  
Technical Comments

Louisiana's 2019 Annual Monitoring Network Plan (ANP), dated June 14, 2019, was received June 25, 2019. This plan will be referred to as the "2019 Plan" throughout the remainder of this document. In accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices, the U.S. Environmental Protection Agency (EPA) has reviewed the 2019 Plan and our comments are provided below. The comments below reflect the EPA's efforts in collaboration with the Louisiana Department of Environmental Quality (LDEQ) to maintain an accurate and efficient ambient air monitoring network.

**General Comments**

We appreciate the LDEQ's submittal of the 2019 Plan in accordance with 40 CFR §58.10.

*Operation of monitoring network in accordance with 40 CFR Part 58 and Appendices A, B, C, D and E*  
We appreciate the LDEQ's operation of the ambient air monitoring network in accordance with federal requirements defined in 40 CFR Part 58 Appendices A, B, C, D, and E (2018 Plan, p. 2).

Thank you for your efforts to ensure that the information in the ANP and the Air Quality System (AQS) database are complete and consistent.

**Ozone (O<sub>3</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.1)

The LDEQ is currently meeting the network design requirements for ambient air quality monitoring for ozone. See 40 CFR Part 58, Appendix D Section 4.1.

*Carville Site: Ozone Monitor Relocation*

We acknowledge that the Carville ozone site was relocated since the 2018 ANP was submitted and appreciate the associated note in AQS [the site was relocated a short distance to the west on July 3, 2018, (approved by letter March 22, 2018) and has the same AQS number (AQS ID 22-047-0012)].

*Monroe, LA, Metropolitan Statistical Area (MSA)*

The EPA remains supportive of the continued operation of the ozone monitor at the Monroe site (AQS ID 22-073-0004) to maintain ozone monitoring coverage for the Northeast regional area.

**Carbon Monoxide (CO) Monitoring** (40 CFR Part 58, Appendix D Section 4.2)

The LDEQ is currently meeting the network design requirements for ambient air quality monitoring for CO. See 40 CFR Part 58, Appendix D Section 4.2.

**Nitrogen Dioxide (NO<sub>2</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.3)

The LDEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for NO<sub>2</sub>. See 40 CFR Part 58, Appendix D Section 4.3.

### **Sulfur Dioxide (SO<sub>2</sub>) Monitoring** (40 CFR Part 58, Appendix D Section 4.4)

In 2016 and 2017 as required by the Data Requirements Rule (DRR), the LDEQ took steps to characterize the air quality around SO<sub>2</sub> sources with emissions of 2,000 tons per year or greater by modeling some sources and monitoring others. As noted in our response to the LDEQ's 2018 ANP, the EPA will continue discussions with the LDEQ to work on the SO<sub>2</sub> monitoring network as appropriate.

### **SO<sub>2</sub> Annual Report**

Additionally, separate from the ANP review, we acknowledge receipt of the LDEQ 2019 SO<sub>2</sub> annual reports for Big Cajun II Power Plant, Dolet Hills Power Station, and Brame Energy Center required under §51.1205, which were received in a letter from the Secretary dated August 5, 2019. Although there was a slight uptick in annual emissions for Brame Energy Station in 2018, average annual emissions over the most recent three-year period have decreased in Rapides Parish when compared to the modeled years. Likewise, emissions continue to decrease in De Soto and Point Coupee Parishes for Dolet Hills and Big Cajun II. All three designated areas continue to be in attainment of the 2010 one-hour SO<sub>2</sub> primary NAAQS. Therefore, the EPA agrees with LDEQ's recommendation that no further modeling is required.

### **Lead (Pb) Monitoring** (40 CFR Part 58, Appendix D Section 4.5)

The LDEQ is currently meeting the network design requirements for ambient air quality monitoring for Pb. See 40 CFR Part 58, Appendix D Section 4.5. The EPA acknowledges that no changes have occurred in the LDEQ Pb monitoring network with submittal of the 2019 Plan.

#### *Capital NCore Site: Pb Monitor Shut Down*

We acknowledge that the Capital Lead Monitor was shut down and appreciate the associated note in AQS [the site was shut down on March 27, 2018 (approved by letter March 22, 2018)]. The EPA thanks the LDEQ for its lead-based work at this site.

#### *Baker LSP Site*

We note the discussion in the 2019 ANP of continued operation of the Pb monitor at the Baker LSP Site (AQS ID 22-033-0014) until the demolition and remediation activities at the nearby Exide Technologies Recycling Site are completed, and the LDEQ's plan to keep us informed of the status. We support the continued operation of this monitor.

### **Particulate Matter (PM) Monitoring**

#### **Particulate Matter of 10 Microns or Less (PM<sub>10</sub>)** (40 CFR Part 58, Appendix D Section 4.6)

The LDEQ currently operates a total of five Continuous PM<sub>10</sub> monitors at five sites. Quality assurance collocation requirements of 40 CFR 58 Appendix A Section 3.3.4 do not apply to the Continuous monitors. The PM<sub>10</sub> network as presented in 2019 Plan meets the network design requirements for ambient air quality monitoring.

**Particulate Matter of 2.5 Microns or Less (PM<sub>2.5</sub>)** (40 CFR Part 58, Appendix D Section 4.7)

The LDEQ currently operates a total of twenty-seven PM<sub>2.5</sub> monitors at twenty sites. There are seventeen manual Federal Reference Method (FRM) 145 National Ambient Air Quality Standard (NAAQS) comparable, one Continuous Federal Equivalent Method (FEM) 170 NAAQS comparable, two Continuous FEM 170 non-NAAQS comparable, and seven Continuous non-FEM / non-FRM non-NAAQS comparable PM<sub>2.5</sub> monitors in the LDEQ's network.

The LDEQ has designated Background (AQS ID 22-079-0002) and Transport (AQS ID 22-019-0009) PM<sub>2.5</sub> monitors and operates a Near Road PM<sub>2.5</sub> monitor in the New Orleans-Metairie MSA (AQS ID 22-071-0021).

The LDEQ provides quality assurance collocation for the FRM 145 PM<sub>2.5</sub> monitors at three sites. Quality assurance collocation does not apply to non-NAAQS comparable PM<sub>2.5</sub> monitors. Quality assurance collocation does not apply to the FEM 170 monitor reporting NAAQS comparable data since the monitor is not the primary PM<sub>2.5</sub> monitors at the relevant site.

The PM<sub>2.5</sub> network meets the network design requirements for ambient air quality monitoring.

*Marrero Site: PM<sub>2.5</sub> Monitor Relocation*

We acknowledge that the Marrero PM<sub>2.5</sub> monitor was relocated since the 2018 ANP was submitted and appreciate the associated note in AQS [the site was relocated a short distance to the northwest on November 14, 2018, (approved by letter March 22, 2018) and has the same AQS number (AQS ID 22-051-2001)].

We support the continued operation of the Vinton (AQS ID 22-019-0009), Alexandria (AQS ID 22-079-0002), and Geismar (AQS ID 22-047-0005) monitors.